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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WILLIENE JACKSON-JONES,
individually and on behalf of all others
situated,

Plaintiff,

vs.

EPOCH EVERLASTING PLAY, LLC, a
Delaware limited liability company, and
AMAZON.COM SERVICES LLC, a
Delaware corporation,

Defendants.

Case No.: 2:23-cv-02567-ODW-SK

**JOINT STIPULATION TO
EXTEND CASE SCHEDULE**

STIPULATION

WHEREAS, on November 14, 2023, the Court entered the Scheduling and Case Management Order, which set forth certain discovery, motions, pre-trial and trial deadlines (ECF 44);

WHEREAS, all Parties have been working and continue to work diligently to advance fact and expert discovery in this case pursuant to the Scheduling and Case Management Order, including actively conferring in good faith regarding discovery disputes and ongoing production of documents;

WHEREAS, key witnesses—corporate representatives of Defendant Epoch Everlasting Play, LLC and Defendant Amazon.com Services LLC—are unavailable for depositions until late October or early November due to international business travel, hosting of various business meetings, and other work-related obligations;

WHEREAS, the Parties now seek, for the first time, to extend the remaining case deadlines, as set forth below;

WHEREAS, good cause supports the requested extension, which is driven by witness availability and the Parties' joint and good faith efforts to establish a feasible schedule to accommodate witness availability while completing the remainder of the case schedule as efficiently as possible. Because key witnesses are unavailable for depositions until late October or early November, the expert report deadline (October 21, 2024) and fact discovery cutoff (November 11, 2024) cannot hold, as the Parties will not have sufficient time to obtain deposition transcripts, process the content, and potentially incorporate that information into reports or seek related discovery.

Subsequent deadlines, such as the expert discovery cutoff and the final day to file a dispositive motion, must then shift too, to permit the case to proceed in the appropriate order of events. As needed, the Parties have also included minor adjustments to the proposed case schedule to account for holidays. Accordingly, the Parties have conferred and agreed—subject to the Court's approval—to extend the remaining case schedule as set forth below:

	Current Dates	Proposed Dates
Expert Reports Due	October 21, 2024	November 18, 2024
Fact Discovery Cutoff	November 11, 2024	December 16, 2024
Expert Rebuttals Due	November 11, 2024	December 16, 2024
Expert Discovery Cutoff	December 16, 2024	January 20, 2025
Last Day to File Motion for Summary Judgment	December 9, 2024	February 3, 2025
Last Day to File Other Motions to be Heard	December 16, 2024	February 3, 2025
Last Day for Settlement Conference	January 6, 2024	March 3, 2025
Last Day to Have Motion Heard	January 13, 2025	March 10, 2025
Proposed Pretrial Conference Order, Memoranda and Contentions of Fact and Law, Joint Witness Lists, Joint Exhibit List, and Exhibit Stipulation and Proposed Findings of Fact and Contentions of Law	February 24, 2025	April 21, 2025
Motions in Limine	February 26, 2025	April 23, 2025
Final Pre-Trial Conference	March 3, 2025	April 28, 2025
Oppositions to Motions in Limine	March 5, 2025	May 2, 2025
Hearing on Motions in Limine	March 17, 2025	May 12, 2025
Final Trial Exhibit Stipulation Due	March 20, 2025	May 19, 2025
Bench Trial	March 28, 2025	May 28, 2025

WHEREAS, all Parties have agreed to the requested extensions; and

WHEREAS, no Party will be prejudiced by the requested extensions and this stipulation is not made for the purpose of delay or any other improper purpose.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties hereto—subject to the Court’s approval—that the case shall proceed according to the above extended case schedule set forth as the “Proposed Dates.” A proposed order reflecting this relief is being filed along with this stipulation.

1 Dated: September 25, 2024

**ARNOLD & PORTER KAYE SCHOLER
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ATTESTATION OF CONCURRENCE

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 25, 2024

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